17 Invertose Drive Port Colborne, Ontario Canada L3K 5V5 Tel: 905-835-1203 Toll Free: 888-We-Reduce Fax: 905-835-6824 www.rawmalerials.com



February 12th, 2013

Via Courier

Mr. Joseph Martens, Commissioner
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Division of Environmental Remediation
Hazardous Waste Manifests and Reporting Section
625 Broadway, 12th Floor
Albany, New York
12233-7252

Dear Mr. Martens:

Re: NYSDEC Annual Report for EPA I.D. Number NYR000100891 - Universal Waste Exports for 2012 Calendar Year

Please find enclosed a copy of Raw Materials Co. Inc. Annual Report for the 2012 calendar year as required by 6NYCRR 374-3.3(k) and 6NYCRR 372.5(f).

Also enclosed is a copy of a letter from NYSDEC dated October 15^t, 1998 stating the facilities report requirements.

If you require any additional information please feel free to contact me at our Toll Free number 1-888-937-3382

Sincerely,

Raw Materials Company Inc.

James Ewles President

Cc.

Encl. Annual Report

NYSDEC letter dated October 15th, 1998

Mr. Scott Nelson

Office of Enforcement and Compliance Assurance

Office of Compliance, Enforcement Planning, Targeting and Data (2222A)

ENVIRONMENTAL PROTECTION AGENCY

1200 Penn Avenue NW, Ste. 6144

Washington, DC

20004

Raw-NYSDEC-2012 Universal Waste Export Annual Report-Feb 2013





NYSDEC February 12th, 2013 Page 2 of 4

ANNUAL REPORT - UNIVERSAL WASTE EXPORTS - CALENDAR YEAR 2012

To: New York State Department of Environmental Conservation

Division of Environmental Remediation Hazardous Waste Manifest and Reporting Section 625 Broadway, 12th Floor Albany, New York 12233-7252

And;

U.S. Environmental Protection Agency

Office of Enforcement and Compliance Assurance
Office of Compliance, Enforcement Planning, Targeting and Data Division (2222A)
1200 Penn Avenue NW, Ste. 6144
Washington, DC
20004

Exporter: Raw Materials Company Inc.

EPA I.D. Number: Exporting Address: NYR000100891 812 East Ferry Street Buffalo, New York, USA

14211

Importer: Raw Materials Company Inc.

Receiving Address:

17 Invertose Drive

Port Colborne, Ontario, Canada

L3K 5V5

Mailing Address:

Ontario MOE Certificate of

Approval Number:

A120316

Importer: Tonolli Canada Ltd.

Receiving Address:

133 Tonolli Road

Mississauga, Ontario, Canada

Mailing Address:

Ontario MOE Certificate of

Ontario MOL Certificate of

Approval Number:

Same

A220129

NYSDEC February 12th, 2013 Page 3 of 4

Certification

Under penalty of the law, I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Signed:

Lori Spittal

Raw Materials Company Inc.

NYSDEC February 12th, 2013 Page 4 of 4

UNIVERSAL WASTE EXPORTS - SHIPMENT SUMMARY - CALENDAR YEAR 2012

Consignee for shipments:

Raw Materials Company Inc., 17 Invertose Drive, Port Colborne, Ontario, Canada Tonolli Canada Ltd., 1333 Tonolli Road, Mississauga, Ontario, Canada

Description of Hazardous Waste	EPA HAZ. Waste No.	DOT Hazard Class No.	Total Shipments per Waste Stream 2012	Total Weight (lbs.) 2012	Total Weight (lbs.) 2011	Variance between years (=/-)
Waste Nickel Cadmium Batteries (Vented/Sealed)	D006	8	1	852	9,387	-8,535
Waste Lithium Batteries	D003	9	9	77,879	98,853	-20,974
Waste Alkaline Batteries	D002	8	36	617,340	848,730	-231,390
Waste Lead Acid Batteries	D008	8	7	71,175	80,932	-9,757
Waste Mercury, Contained in Manufactured Articles/Batteries	D009	8	0	0	3,765	-3,765
Air Depolarized Zinc (Non Toxic)	D002	8	0	0	26,210	-26,210
Total Weights	<u></u>		W. I	767,246	1,067,877	-300,631
Total number of shipments for waste streams			47	-	53	-6

Transporters for 2012 Shipments:			
Transporter Name	Transporter Permit Number		
Tonawanda Tank Transport Services Inc.	NYD097644801		
Raw Materials Company Inc.	CD-098		
Tonolli Canada Inc.	N/A		
Mannley Transport Inc.	N/A		

New York State Department of Environmental Conservation Hazardous Waste Report Site Identification Form Calendar Year Being Reported - 2012



1. Site EPA ID Number	EPA ID Number LN1Y1010101110101819111					
2. Site Name	Name: Raw Materials Company					
3.Site	Street Address: 812 Fast Ferry Street					
Location Information	City, Town, Village: Buffal	County Code: Frie				
	State: New York	Zip Code: 14211				
4. Site Land Type	☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State					
5. NAICS Codes for the Site: (enter at least a 5 digit code)	A. (4,9,3,1,9) B. (1)					
	C	<u>.</u>				
6. Site	Street or P.O. Box: 17 Invertose Drive					
Mailing Address	City, Town, Village: Port Colborne					
	State: Ontario	Country: Canada	Zip Code: L3K 5V5			
7.Site Contact	First Name: James	MI: Last: Evle	es			
Person	Title: President					
	Street or P.O. Box: 17 Invertose Drive					
	City, Town, Village: Port Colborne					
	State: Ontario	Country: Canada	Zip Code: L3K 5V5			
	Email: jewles@rawmaterials.com					
. [Phone: 905-835-1203	Ext: 226	Fax: 905-835-6824			
Owner of the Site	Name of Site's Legal Owner: KBSD, LLC Date Became Owner: March 8, 2001					
	☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State					
	Street or P.O. Box: 1352 Genesee Street					
	City, Town, Village: Buffalo	Phone: 716-332-4068				
	State: New York	Country: U. S. A.	Zip Code: 14211			
9. Legal Operator of	Name of Site's Operator Raw N	Date Became Operator:				
Oberator of	☑ Private ☐ County ☐ Dis	trict 🛘 Federal 🖟 Tri				

10. Type of Regulated Waste Activity Mark "Y" or "N" for all current activities (as of the date submitting this form); complete any additional boxes as instructed.					
A. Current Hazardous Waste Activities; Complete all parts 1 -7.					
Y N M 1. Generator of Hazardous Waste If "Yes", mark only one of the following – a, b, or c.	Y N 🗵 2. Transporter of Hazardous Waste If "Yes", mark all that apply.				
	a. Transporter				
Generales, in any calendar month, 1,000 kg/mo (2,200 lbs/mo) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.	b. Transfer Facility (at your site) Y N X 3. Treater, Storer, or Disposer of Hazardous Waste Note: a hazardous waste permit is required for these activities.				
b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.	Y N X 4. Recycler of Hazardous Waste				
C. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.	Y N X 5. Exempt Boller and/or Industrial Furnace If "Yes", mark all that apply				
Y N . d. United States Importer of Hazardous Waste	a. Small Quantity On-site Burner Exemption				
Y N M e. Mixed Waste (hazardous and radioactive) Generator	b. Smelting, Melting, and Furnace Exemption				
	Y N 🗓 6. Underground Injection Control				
	Y N X 7. Receives Hazardous Waste from Off-Site				
B. Universal Waste Activities; Complete all parts 1 - 2	C. Used Oil Activities; Complete all parts 1 -4				
Y N 1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more of any universal wastes at any time) indicate types	Y N X 1. Used Oil Transporter If "Yes", mark all that apply. a. Transporter				
of universal waste managed at your site. If "Yes". mark all that apply.	b. Transfer Facility (at your site)				
a. Batteries	Y □ N 菜 2. Used Oil Processor and/or Re-refiner If "Yes", mark all that apply.				
☐ b. Pesticides	a. Processor				
x c. Mercury containing equipment	☐ b. Re-refiner				
🔀 d. Lamps	Y N 😡 3. Off-Specification Used Oil Burner				
Y N 🗵 2. Destination Facility for Universal Waste Note: A hazardous waste permit may be	Y N X 4. Used Oll Fuel Marketer If "Yes", mark all that apply.				
required for this activity.	a. Marketer Who Directs Shipment of Off-Specification used Oil to Off-Specification Used Oil Burner				
	b. Marketer Who First Claims the Used Oil Meets the Specifications				

11. Comments				
*				
	And the second s	- 1112 V A		
		Vopor segment of		
12. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.				
Signature of legal owner, operator, or their authorized representative	Name and Official Title (please print)	Date Signed (mm/dd/yyyy)		
	James Ewles, President	02/12/2013		

New Yor State Department of Environmental Conservation Division Solid and Hazardous Materials

Bureau of the Albany, New York 12233-7251 Phone: (518) 457-9257 FAX: (518) 485-8769



OCT 1 5 1998

Mr. Rick Unyi Raw Materials Corporation P.O. Box 6 Invertose Drive Port Collbone, Ontario Canada L3K5V7

Dear Mr. Unyi:

This is in response to your September 17, 1998 letter concerning a request for information on the regulatory applicability, to Universal Waste Handlers (UWH), of various reporting requirements of RCRA Subtitle C. Your letter asks for a determination of applicability to UWHs of regular annual reporting.

If the only wastes managed by Raw Materials Corp. are universal waste and exempt scrap metal, the reporting requirements for hazardous waste outlined at 6NYCRR 372.2(c)(2) are not applicable. The Universal Waste Rule is an alternative management regulation which manages hazardous waste independently of other, more standard hazardous waste regulations. Universal wastes are not subject to 6NYCRR Part 372 reporting requirements for generators. Scrap metal being recycled is not subject to 6NYCRR Part 372 requirements at all.

Reporting requirements that would be applicable to your activities are for universal waste exports. 6NYCRR 374-3.3(k) requirements for exports, and the reference to NYCRR 372.5(f) requirements for reporting those exports, remain applicable. No reporting is required for exports of hazardous scrap metal being recycled.

If you have any further questions, please contact John Miccoli of my staff at (518) 485-8988.

Sincerely,

Lawrence Nadler

Chief

Technical Determination Section

Bureau of Hazardous Waste Management

Division of Solid & Hazardous Materials

cc: J. Miccoli

"RECEIVED OCT &

8

From: (905) 835-1203 Reception **RAW Materials** 17 Invertose Dr

Port Colborne, ON L3K5V5 CANADA

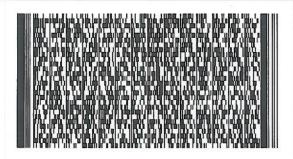
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BILL SENDER Mr. Scott Nelson

Environmental Protection Agency Office of Enforcement & Compliance 1200 Penn Avenue NW, Ste 6144

WASHINGTON, DC 20004



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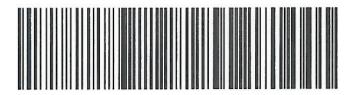
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